James D. Wilson #95B0367 Orlreans Correctional Facility 3531 Gaines Basin Road Albion, New York 14411 FCC Mail Room

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OF MALESTANIA A TENT TO THE DOOR IS AS THE SPECIAL December 8, 2014

age to made periodic deplicate solle to ver our annity cusperts, because bad a service of the Marlene H. Dortch, Esq. DOCKET FILE COPY ORIGINAL Secretary Federal Communications Commission 445 12th Street, SW; Room TW-B204 Washington, D.C. 20554

Re: WC Docket Number 12-375

Dear Secretary Dortch:

I have been imprisoned in the State of New York for twenty odd years, and up to about five years ago, I made periodic telephone calls to various family members, friends and associates, but when the State Officials allowed Unisys Corporation and Value Added Communication, Inc., to operate the prison telephone system, that company immediately instituted what I call an escrow accounts where the prisoners' family or other would place on deposit a bare minimum of \$25.00 and escalating amounts.

The company is able to hold thousands of dollars of prisoners' family money and draw interest off of it. Without any real benefit to prisoners or their families

Why must the company operate different from regular telephone companies and obtain its respective remittances from the family's regular telephone carrier rather than having to deal with a special and separate carrier in order to talk with a New York State Prisoner.

Originally, the prison telephone carrier was content to receive it monthly remittances from the various telephone company involved in the transactions.

The situation as it exists now amounts to an ancillary fee where the above-referenced corporation is able to collect thousands of dollars, in addition to other thousands of dollars interest on the money held in escrow.

There is no structure within this system to allow the escrow account for the benefit of the depositor. For example, if one deposits \$25.00 and does not use any portion of it for two or three months for telephone calls, should not the depositor receive a substantial portion of the interest which has accrued on it?

Further, there is no way to retrieve deposited monies the operating company assuming the prisoner for whatever reason does not desire to use telephone ever again.

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Who retains possession of the deposited monies?

Prisoners should be able to dial directly from an approved list of telephone numbers without the imposition of a middleman connector charging an artificial toll fee and compel the middleman connector to obtain its remittances directly from the company who handled that particular number called rather than forcing the prisoners' loves, friends and associates to open a special account with the predatory concern of Unisys Corporation and Value Added Communications, Inc., and deposit money into it.

That way, family, friends and associates will have ONLY one telephone bill and that would be their respective regular carriers which in many cases have conducted their communication activities for years.

Thanks for considering my concerns about this mater.

Very truly yours

James D. Wilson

Attorney General State of New York